

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

DELHI OSORIO RIVERA

DEBTOR

CASE NO 19-02481 BKT

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S OBJECTION TO CONFIRMATION
DOCKET NO. 9**

TO THE HONORABLE COURT:

COMES NOW, DELHI OSORIO RIVERA, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Report of Action Taken Meeting of Creditors and Objection to Confirmation*, Docket No. 9, objecting the confirmation of Debtor's proposed Chapter 13 Plan (Docket No. 3), basically stating the following:

- that the Plan is insufficiently funded considering a claim filed by Reliable;
- that a insurance quote states a different maturity date than that disclosed in a claim filed by Reliable;
- that SOFA Item #9 discloses a claim against CFSE; and
- that the Debtor's reported gross income is different from the pay stubs submitted.

2. The Debtor respectfully states that Reliable/Popular Auto is not a listed creditor in the present case, nor does the Debtor owe any car loan (secured claim) to said creditor. The attached copy of the case claims register does not show a claim filed by Reliable.

3. That the Debtor's SOFA, filed at Docket No. 01, does not reflect that the Debtor has a listed claim against CFSE at item #9. At the 341 meeting of creditors the Debtor testified that she did not have said claim as stated by the Chapter 13 Trustee. Attached is copy of the Debtor's *Statement of Financial Affairs* (SOFA) page 3, Item #9, which reflects that the Debtor disclosed that she had no pending administrative or judicial claims.

4. That on this same date, June 17, 2019, the Debtor filed an *Amended Form 122C-1*, and also filed *Amended Schedules I & J*, to cure the objections raised by the Chapter 13 Trustee, Docket No. 9, concerning the Debtor's reported gross income, in the above captioned case.

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5. The Debtor hereby respectfully responds to the Trustee's objection to Plan confirmation (Docket No. 9), in the above captioned case.

WHEREFORE, the Debtor respectfully prays that the Trustee's objection to Plan confirmation, Docket No. 9, be denied and that the Debtor's proposed Chapter 13 Plan, Docket No. 3, be confirmed.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and I also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: the Debtor, Delihi Osorio Rivera, Paseo de la Ceiba 203 Areca Street Juncos PR 00777, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 17th day of June, 2019.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
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